

July 13, 2009 via electronic filing

Ms. Rosa G. Lewis Senior Campaign Finance Analyst Reports Analysis Division Federal Election Commission Washington, D.C. 20463

Re: SEIU COPE Year End Report (11/25/08-12/31/08)

Dear Ms. Lewis:

This is in response to your letter to SEIU COPE, dated June 10, 2009. In your letter, you ask two questions regarding the above referenced Report.

- 1) We are filing an amended Post-General report that will itemize and clarify the expenditures that correlate to the activity reported on the 24 hr notices that you inquired about.
- 2) The expenditure in this report that was described as for ""newswire services"" was for distribution of a press release and did not constitute a ""public communication"" under the Commission's regulations and was correctly included on the report Line 21.

The expenditure in this report that was described as for ""Communications consulting"" paid to The Hauser Group, was for general consulting not related to any public communication containing express advocacy and was correctly included on the report Line 21.

Upon further review of the expenditures in this report that were described as for ""Communications consulting"" paid to Fenton Communications we have determined that they were for additional expenses for services and expenses related to the production of communications previously reported on 48hr notices and our amended report will include these expenses on line 24 and Schedule E and correlate to the relevant 48hr notice.

Upon further review of the expenditure in this report that was described as for ""Printing"" we have determined that the \$410 was for a communication distributed on election day that did contain express advocacy for three federal candidates and our amended report will include these expenses on line 24 and Schedule E. Since they were distributed on election day, no 24 hr notice was required to be filed.

Please feel free to contact me if you have any further questions.

Sincerely,

Robert Hauptman for SEIU COPE